

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

Plaintiff,

-v-

24-MC-

\$182,764.34 UNITED STATES CURRENCY
SEIZED FROM M&T BANK ACCOUNT
NO. 15004244992829 SEIZED ON OR
ABOUT JULY 13, 2023; and

\$21,831.90 UNITED STATES CURRENCY
SEIZED FROM M&T BANK ACCOUNT
NO. 15004244994768 SEIZED ON OR
ABOUT JULY 13, 2023,

Defendants in rem.

**STIPULATION TO EXTEND PLAINTIFF'S TIME
TO FILE COMPLAINT IN CIVIL FORFEITURE ACTION**

IT IS HEREBY STIPULATED and agreed upon between the parties, the United States of America by its attorney, Trini E. Ross, United States Attorney for the Western District of New York, Mary Clare Kane, Assistant United States Attorney, of counsel, and Michael L. D'Amico, Esq., attorney for claimant Shamsor Naher, that the government's time to file its Verified Complaint for Forfeiture be extended from May 8, 2024 to August 6, 2024, pursuant to Title 18, United States Code, Section 983(a)(3)(A).

The parties to this Stipulation further agree that the putative claimant may revoke her consent in writing to extend the time for the government to file its Verified Complaint for Forfeiture against the above-named property, and in that event, the government shall then

have fourteen (14) days from the date the government received notice of such action to file its Verified Complaint for Forfeiture.

Dated: April 19, 2024

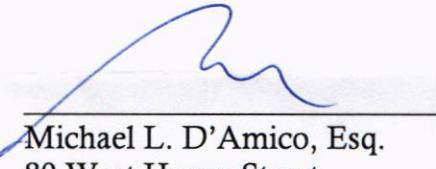
TRINI E. ROSS
United States Attorney
Western District of New York

By:

Mary Clare Kane
Mary Clare Kane
Assistant United States Attorney
138 Delaware Ave
Buffalo, New York 14202
716-843-5816
mary.kane@usdoj.gov

Dated: April 19, 2024

By:


Michael L. D'Amico, Esq.
80 West Huron Street
Buffalo, New York 14202
716-854-1300
mldamico@buffalodefenselaw.com
Attorney for Shamsor Naher